

May 04, 2011

Mr. Terry Drochak  
Washington State Department of Transportation  
Northwest Region  
15700 Dayton Avenue North  
P.O. Box 330310  
Seattle, WA 98133-9710

RE: SR 9 Pilchuck Creek Bridge-Highway Realignment and New Bridge Project  
Section 106 Consultation

Dear Mr. Drochak

Thank you for your invitation dated, April 11, 2011, to participate in the Section 106 Consultation for the subject project.

Please refer to the FTP directory, DOT 11-01, that contains the report titled "Cultural Resources Investigation..." On page one of the report the project was defined by WSDOT as "...realignment of the highway and demolition of the existing bridge..." I believe it was premature for WSDOT to have made a decision to demolish the bridge before the Section 106 process had even started, and then invite the consulting parties to comment on alternatives regarding the preservation of its historic integrity. This was disappointing and certainly does not represent a good faith effort by WSDOT to comply with the provisions of 36 CFR 800.1 (a) that states: "The goal of consultation is to identify historic properties potentially affected by the undertaking, assess the effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties." Note the use of the word "any."

Since no information is provided pertaining to the details of the four alternatives identified in WSDOT's letter, and in view of the decision to demolish the bridge, I wish to withhold comments pending your ongoing evaluation of the alternatives.

In the meantime, in accordance with the provisions of 36 CFR 800.6 (C) (3) and 800.11(e), I request the Department to furnish the following information and documents to help me and, I assume, the other consulting parties, become more familiar with the bridge. I suggest posting this information on the FTP site so it is readily available to all Parties.

1. A copy of the latest inspection report and a link to obtain previous reports.
2. The design drawings and all structural details that pertain to the bridge.
3. All drawings, details and any information that provides a history of the changes, repairs and renovations made to the bridge since it was built in 1916. Include cost estimates and detailed plans for demolition.
4. A copy of the latest NBI Structure Inventory and Appraisal Report (SIA).
5. On the FTP Directory, Document 2006 CRS, the "Historic Property

Inventory Report" prepared by Eastern Washington University (EWU) identifies the NRHP eligibility under Criterion C. I believe it may also be eligible under Criterion A. Because this bridge is nearly 100 years old it seems very probable that it is associated with important events or activities in transportation, community planning and development, and commerce. Therefore, in accordance with 36 CFR 800.4 I request that the records of EWU be revisited along with other possible sources within the Department, background research in appropriate archives, the news media, oral interviews in the local and regional areas, etc, to seek all potential sources for information that would identify the significant contributions that the bridge made to the historical development of the area. Please advise the Parties when this activity will commence, a brief outline of the tasks to be performed and post all of the findings on the FTP site as the material becomes available.

6. Post on the FTP site all documents and communications submitted by the consulting parties, agencies, Tribes and others.
7. Provide e-mail addresses and phone numbers of individuals, both within and outside of the Department, to contact for clarification of data or inquiries related to the Section 106 process. This would help the consulting parties to use their time more efficiently and, also, share information and develop a dialogue with each other regarding the project,
8. Your attention is directed to 36 CFR 800.11, "Documentation Standards" when preparing the statements pertaining to each of the alternatives and 36 CFR 800.4 pertaining to identification of historic features. Please provide complete and accurate information using sound, engineering and analytical data along with other documented evidence to support the alternatives.
9. Please provide documentation, particularly analytical data, that describes whether the bridge is causing adverse affects upon the stream flows, floods, fish habitat and constrictions. Provide maintenance records with costs for debris and drift removal or confirm this type of maintenance has not been necessary. If the bridge is removed please provide an analysis to support any benefits or significant changes that would result in the characteristics of the stream flows and flooding, or confirm there are none.
10. Please explain why a decision appears to have been made to demolish the bridge without giving proper consideration for preservation and protection within the Federal, State and local laws and guidelines for historic preservation.

Thank you for your time and efforts,

Respectfully yours,

Robert H. Krier, P.E. (CE & SE)

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